



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132 - 5190

M60050.003032
MCAS EL TORO
SSIC NO. 5090.3

5090
Ser 06CC.AP/1126
August 1, 2003

Ms. Nicole Moutoux
Remedial Project Manager
U.S. Environmental Protection Agency
Mail Code STD-8-2, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. Rafat Abbasi
Remedial Project Manager
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5796 Corporate Avenue
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Mr. John Broderick
Remedial Project Manager
California Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3339

Fellow Federal Facility Agreement (FFA) Representatives:

**SUBJECT: FEDERAL FACILITY AGREEMENT EXTENSION REQUEST, OPERABLE
UNIT (OU)-3, SITE 1, EXPLOSIVE ORDNANCE DISPOSAL RANGE,
FORMER MARINE CORPS AIR STATION (MCAS) EL TORO, CALIFORNIA**

This letter is written to request an extension to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit 3, Site 1, Explosive Ordnance Disposal (EOD) Range, requires revised milestone deliverable dates for the Draft Remedial Investigation Report and subsequent deliverables. Enclosure (1) presents our project schedule with the revised primary FFA milestones included. This request will extend the deliverable date for the Draft Remedial Investigation (RI) Report by 15 months, and is made pursuant to Section 9.2 (b) and (g) of the FFA.

Progress on the remedial investigation, the radiological assessment, and supplemental perchlorate investigations continues to be reported to the Base Realignment and Closure (BRAC) Cleanup Team (BCT) in scheduled bi-monthly meetings, via conference calls, and through E-mail from the Navy's project team. In addition, there continues to be extensive deliberation on the results of the screening ecological risk assessment as well as the appropriate extent of sampling at the retention pond. There is consensus that supplemental sampling of the pond area will be required, however, the extent is still under discussion among the Navy, BCT, and other environmental agencies. In order to incorporate the supplemental ecological and the radiological sampling results into the remedial investigation, the submittal date for the Draft RI Report must be extended 15 months from the previous submittal date. Also, timelines for subsequent deliverables need to be revised.

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In addition, the Navy is planning a time-critical removal action to address elevated perchlorate concentrations in the groundwater at Site 1. This action is being proposed to mitigate potential migration of high perchlorate contamination from the site. The timeline for this removal action has been briefed to the BCT and the Restoration Advisory Board (RAB) and is also presented in the enclosed project schedule.

This extension request is necessary to account for the hard work and time associated with resolving the issues discussed above. These BCT activities are acceptable causes for extensions per the FFA, Section 9. The specific language in the FFA used as the principal justification for this extension request is:

Section 9.2 (g): Any other event or series of events mutually agreed to by the Parties as constituting good cause.

With the BCT working together on resolving the remaining issues for Site 1, we can move forward with expedient submittal of the necessary CERCLA deliverables, including the draft feasibility study, draft proposed remedial action plan, and draft Record of Decision (ROD). Based on the proposed deliverable dates summarized below, an extension of 15 months is required.

Primary Document	Current Deliverable Date	Revised Deliverable Date	Extension
Draft RI	02/19/03	5/27/04	15 months
Draft FS	12/06/03	3/7/05	15 months
Draft PP	03/18/04	7/18/05	16 months
Draft ROD	08/25/04	12/15/05	16 months

Thank you in advance for your cooperation and support. Should you have questions or need additional information, please contact Mr. Gordon Brown, Remedial Project Manager, at (619) 532-0791 or me at (619) 532-0784.

Sincerely,



F. ANDREW PISZKIN
Base Realignment and Closure
Environmental Coordinator
By direction of the Commander

Enclosure: 1. Phase II RI EOD Range, Site 1 Schedule, MCAS El Toro, California –
Dated July 31, 2003

CONFIDENTIAL RECORD

PORTIONS OF THIS RECORD ARE CONSIDERED
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PRIVATE CITIZEN'S HOME ADDRESS
HAS BEEN REDACTED IN
ACCORDANCE WITH THE PRIVACY ACT

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA
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Copy to:
Commandant of the Marine Corps
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2 Navy Annex, Room 3109 (LFL)
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Mr. Robert L. Woodings
Community Co-Chair
El Toro Restoration Advisory Board

Commander
Attn: AC/S ENVIRON MGT
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Writer: G. Brown, 06CC.GB, 2-0791

Typist: A. Piszkin, 06CC.AP, 07/21/03

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